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8 **Attorneys for Plaintiff,**  
9 **BIG ROCK ASSETS MANAGEMENT, LLC**

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 **BIG ROCK ASSETS MANAGEMENT LLC, a**  
13 **Nevada limited liability company,**

14 **Plaintiff**

15 **v.**

16 **MTC FINANCIAL INC. DBA TRUSTEE**  
17 **CORPS., a California Corporation; BANK OF**  
18 **AMERICA, N.A., a National Association; DOES I-**  
19 **X; Inclusive**

20 **Defendants.**

CASE NO.: 2:22-cv-1212-APG-NJK

**STIPULATION AND ORDER TO EXTEND  
TIME TO RESPOND TO BANK OF  
AMERICA, N.A.'S MOTION TO DISMISS  
(FIRST REQUEST)**

21 Big Rock Assets Management, LLC and Bank of America, N.A. stipulate that Plaintiff shall  
22 have up to and including **January 13, 2023**, to file its response to Bank of America, N.A.'s Motion to  
23 Dismiss Complaint, which is currently due on December 13, 2022.

24 Good cause exists to grant this extension. Since the first extension was requested, the parties  
25 have discussed parameters that involve dismissing this action with prejudice. One party has agreed to  
26 the parameters and approval is pending with the other party. Thus, a response to the motion to dismiss  
27 may not necessary.


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1 This is the parties' first request for an extension of this deadline and is not intended to cause  
2 any delay or prejudice to any party.

3 DATED: December 22, 2022.

<b>AKERMAN LLP</b>  <i>/s/ Scott R. Lachman</i>  _____ MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 DONNA WITTIG Nevada Bar No. 11015 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 <i>Attorneys for Bank of America, N.A.</i>	<b>ANDREW BAO &amp; ASSOCIATES</b>  <i>/s/ Andrew A. Bao</i>  _____ ANDREW A. BAO, ESQ. Nevada Bar No. 10508 8020 S. Rainbow Boulevard, Suite 100-163 Las Vegas, NV 89139 <i>Attorneys for Big Rock Assets Management, LLC</i>
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14 **IT IS SO ORDERED.**

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**UNITED STATES DISTRICT JUDGE**  
Case No.: 2:22-cv-1212-APG-NJK

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19 **DATED:** December 26, 2022